

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL JAMES YOUNG, JR.

a/k/a "Unc"

VANCE EDWARD VOLIOUS, JR.

a/k/a "Dank"

a/k/a "Black"

TYRELL CHRISTIAN FEARS

CR. NO.: 3:17-575

18 U.S.C. § 844 (d)

18 U.S.C. § 1716 (j) (2)

18 U.S.C. § 844 (h)

18 U.S.C. § 371

18 U.S.C. § 2

21 U.S.C. § 841 (a) (1)

INDICTMENT

COUNT 1

(Conspiracy to Violate Federal Law)

THE GRAND JURY CHARGES:

1. The Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, ordered, paid for, received, armed, and attempted to re-ship a mail bomb for the purpose of killing an intended victim, S.C.

2. Defendant MICHAEL JAMES YOUNG, JR. is currently incarcerated in the South Carolina Department of Corrections, serving a sentence for murdering his estranged wife's father and, in the same incident, shooting but failing to kill his estranged wife, S.C.

3. VANCE EDWARD VOLIOUS, JR. is a close friend of MICHAEL JAMES YOUNG, JR., and TYRELL CHRISTIAN FEARS is the nephew of MICHAEL JAMES YOUNG JR.

4. At times unknown to the grand jury, but beginning at least in or around 2016, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina, the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, and others known and unknown, knowingly and intentionally combined, conspired, confederated, agreed, and had a tacit understanding

- a. **to commit the offense of Transport and Receipt of Explosives to Kill an Individual:** that is, knowingly to transport and receive, and attempt to transport and receive, in interstate and foreign commerce, explosives with the knowledge and intent that it will be used to kill, injure, and intimidate an individual, in violation of Title 18, United States Code, Section 844(d);
- b. **to commit the offense of Mailing Nonmailable Item with Intent to Kill:** knowingly did deposit for mailing and delivery, and knowingly cause to be

delivered by mail, according to the direction thereon and at any place to which it is directed to be delivered by the person to whom it is addressed, explosives and a device which may ignite and explode, which are declared nonmailable in 18 U.S.C. §1716(a), with intent to kill and injure another, in violation of Title 18, United States Code, Section 1716(j)(2);

c. **to commit the offense of Carrying Explosives**

During the Commission of a Felony: that is, knowingly to carry explosives during the commission of any felony (i.e., a violation of Title 18, United States Code, Section 1716(j)(2)), in violation of Title 18, United States Code, Section 844(h);

d. **to commit the offense of Distributing Controlled**

Substances: that is, knowingly and intentionally to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841.

Purposes of the Conspiracy

5. It was a purpose of the conspiracy for the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, to kill S.C.

6. It was a purpose of the conspiracy for the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, to enrich themselves.

7. It was a purpose of the conspiracy for the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, to obtain shipments of contraband, including explosives and illegal narcotics.

8. It was a purpose of the conspiracy for the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, to conceal their involvement in the conspiracy, including but not limited to ordering, paying, receiving, arming, and re-shipping explosives and ordering, paying, receiving, and distributing illegal narcotics.

Manner and Means of the Conspiracy

9. It was part of the conspiracy that the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, aided and abetted by the other persons

known to the grand jury, did and caused to be done the following:

- a. Order a mail bomb containing explosives that they could send through the mail and explode when opened, killing whomever opened the device.
- b. Receive and arm the device containing explosives.
- c. Obtain shipping labels to mail the explosives.
- d. Deliver the device with explosives to the U.S. Post Office with a label directing the explosives be delivered to S.C. in Florida.
- e. Order, receive, and distribute illegal narcotics.

Overt Acts in Furtherance of the Conspiracy

10. In furtherance of the conspiracy and to achieve its purposes, the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, and others known and unknown to the grand jury, committed the following overt acts, in the District of South Carolina:

- a. MICHAEL JAMES YOUNG, JR. ordered a device containing explosives.
- b. MICHAEL JAMES YOUNG, JR. paid for the explosives.

- c. MICHAEL JAMES YOUNG, JR. obtained shipping labels to send the explosives to the intended victim, S.C., and sent the shipping labels to VANCE EDWARD VOLIOUS, JR.
- d. MICHAEL JAMES YOUNG, JR. and VANCE EDWARD VOLIOUS, JR. spoke on the phone about the shipping labels.
- e. VANCE EDWARD VOLIOUS, JR. provided the shipping labels to TYRELL CHRISTIAN FEARS.
- f. After having received the shipping labels, TYRELL CHRISTIAN FEARS went to the residence of V.M., a minor known to the grand jury, where the explosives were being stored after having been delivered to V.M. by an U.S. Postal Employee.
- g. TYRELL CHRISTIAN FEARS, in accord with instructions provided, armed the explosive device by pulling a line on the side of the mail bomb box. TYRELL CHRISTIAN FEARS then cut the line to ensure it would not be visible from the outside of the package. TYRELL CHRISTIAN FEARS then obtained additional tape to secure the package and to attach two mailing labels

directing the package be delivered to the intended victim, S.C., in Florida.

- h. MICHAEL JAMES YOUNG, JR. and TYRELL CHRISTIAN FEARS spoke on the phone about the explosives.
- i. TYRELL CHRISTIAN FEARS delivered the explosive device addressed to the intended victim to a U.S. Post Office, leaving it beside the mailboxes.
- j. MICHAEL JAMES YOUNG, JR. ordered illegal narcotics to be shipped to V.M.
- k. VANCE EDWARD VOLIOUS, JR. and TYRELL CHRISTIAN FEARS, and others, received, transported, and distributed the illegal narcotics that had been shipped to V.M.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

(Transport and Receipt of Explosives to Kill an Individual)

11. On or about June 5-7, 2017, in the District of South Carolina, the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, and others known and unknown, as principals, aiders and abettors, and co-participants in jointly undertaken criminal activity did knowingly transport and receive, and attempt to transport and receive, in interstate and foreign commerce, explosives with the knowledge and intent that it will be used to kill and injure an individual.

In violation of Title 18, United States Code, Sections 844(d) & 2.

COUNT 3

(Mailing Nonmailable Item with Intent to Kill)

12. On or about June 5-7, 2017, in the District of South Carolina, the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, and others known and unknown, as principals, aiders and abettors, and co-participants in jointly undertaken criminal activity knowingly did deposit for mailing and delivery, and knowingly did cause to be delivered by mail, according to the direction

thereon and at any place to which it is directed to be delivered by the person to whom it is addressed, explosives and devices which may ignite and explode, which are declared nonmailable in 18 U.S.C. §1716(a), with intent to kill and injure another.

In violation of Title 18, United States Code, Sections 1716(j)(2) & 2.

COUNT 4
(Carrying Explosives During the Commission of a Felony)

13. On or about June 5-7, 2017, in the District of South Carolina, the Defendants, MICHAEL JAMES YOUNG, JR., VANCE EDWARD VOLIOUS, JR., and TYRELL CHRISTIAN FEARS, and others known and unknown, as principals, aiders and abettors, and co-participants in jointly undertaken criminal activity did knowingly carry explosives during the commission of any felony (*i.e.*, a violation of Title 18, United States Code, Section 1716(j)(2)).

In violation of Title 18, United States Code, Sections 844(h) & 2.

A TRUE Bill



FOR PERSON

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A handwritten signature in cursive script, appearing to read "Beth Drake", written over a horizontal line.

BETH DRAKE (jnr/wcl)
UNITED STATES ATTORNEY